

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA
AT MARTINSBURG**

FILED

JUL 3 2002

U.S. DISTRICT COURT
MARTINSBURG, WV 25401

LINDA V. MILLER,

and

JENNIFER PARKINSON, an infant by
her grandmother and next friend, Linda V. Miller,

Plaintiffs,

v.

CIVIL ACTION NO. 3:02-CV-42
(Broadwater)

ERIC PRUNEDA,
CARLOS DE LUNA d/b/a AB FARMS,
STATE COUNTY MUTUAL FIRE INSURANCE COMPANY,
CALAMITAS AD CADUCEUM, INC. d/b/a CRITTENDEN ADJUSTMENT
COMPANY,
and
KAREN SELDERS,

Defendants.

**DEFENDANTS ERIC PRUNEDA and CARLOS B. DELUNA d/b/a AB FARMS'
INITIAL DISCLOSURES PURSUANT TO RULE 26(a)(1)**

Defendants Eric Pruneda and Carlos B. DeLuna d/b/a AB Farms, by counsel,
William Prentice Young, make the following initial disclosures pursuant to Rule 26(a)(1):

A. Name, address, and telephone number of each individual likely to
have discoverable information:

1. Plaintiff Linda V. Miller.
700 West Burke Street, #41
Martinsburg, WV 25401
304-671-6520

2. Eric Pruneda
Route 11 Box 1894
Mission, Texas 75872
Phone number not available at this time.
3. Mirna M. Pruneda
Route 11 Box 1894
Mission, Texas 78572
Phone number not available at this time.
4. Jennifer Parkinson
700 West Burke Street, #41
Martinsburg, WV 25401
304-671-6520
5. Patrolman Leslie Witt
232 W. Queen Street
Martinsburg, WV 25401
302-263-0000
6. Tiffany Johnson
522 WV Avenue
Martinsburg, WV 25401
304-267-7732
7. TaWanda Campbell
700 West Burke Street
Martinsburg, WV 25401
304-263-4489

B. Copy of or description of all documents, computations, and tangible things relevant to the disputed facts:

1. West Virginia Uniform Crash Report with attached statement of investigating officer and photographs taken by investigating officer.
2. CAD Operations Report from Martinsburg City Police Department.

3. Written statement of Tiffany Johnson.
4. Written statement of TaWanda Campbell.
5. Recorded Interview summary of Linda Miller.
6. Transcript of recorded interview of Linda Miller.
7. Four photographs taken of plaintiff's vehicle.

C. Computation of any category of damages claimed: Not applicable.

D. Insurance agreements:

1. See attached Declarations page from subject liability policy.

E. Experts: No expert witnesses have been identified by Defendants to date, this answer will be supplemented if and when experts are identified.

This disclosure will be supplemented by defendants if and when additional information and/or witnesses relevant to this civil action are discovered.

Eric Pruneda and Carlos B. DeLuna d/b/a AB Farms
BY COUNSEL



William Prentice Young
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Defendants.

CERTIFICATE OF SERVICE

I, William Prentice Young, counsel for defendants, Eric Pruneda and Carlos B. DeLuna d/b/a AB Farms, herein certify that the foregoing DEFENDANTS ERIC PRUNEDA AND CARLOS B. DELUNA d/b/a AB FARMS INITIAL DISCLOSURES PURSUANT TO F.R.C.P. RULE 26 (a)(1) was served upon the following by mailing a true and accurate copy thereof by first class, United States mail, postage prepaid, to the following addresses this 3rd day of July, 2002:

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William Prentice Young